

**MCLAREN LAW FIRM, PLLC**

2708 82<sup>nd</sup> Street  
Lubbock, Texas 79423

**Gary R. McLaren**  
ATTORNEY AT LAW

Telephone 806-788-0609  
Telefax 806-785-2521

gmclaren@sbcglobal.net

November 20, 2020

Mr. Wren Stenger  
Director  
Superfund and Emergency Management Division  
1201 Elm St., suite 500  
Dallas, Texas 75270  
**CM/RRR 7017 1450 0000 2604 3002**

Mr. David Eppler (SEDAE)  
Superfund and Emergency Management Div., Cost Recovery Section  
U.S. EPA, Region 6  
1201 Elm St., suite 500  
Dallas, Texas 75270  
[eppler.david@epa.gov](mailto:eppler.david@epa.gov)

RECEIVED  
20 DEC -4 AM 8:30  
SUPERFUND DIV.  
DIRECTOR'S OFF.

**RE: Notice of Potential Liability and Demand for Payment  
F. J. Doyle Salvage Superfund Site  
Leonard, Fannin County, Texas, SSID # 061D**

Dear Messrs Stenger and Eppler:

Our law firm represents Lighthouse Electric Cooperative, Inc. ("Lighthouse") located in Floydada, Texas. Our client has furnished us a copy of Mr. Stenger's undated, Demand For Payment ("Demand") received by Lighthouse on November 19, 2020.

As you are aware, your Demand requires a response of our client within thirty (30) days of receipt of the letter, or December 18, 2020.

Respectfully, Lighthouse requests ninety (90) days from receipt of your letter, or February 17, 2021, to formulate a response. As you are aware, the underlying facts of the EPA's demand occurred more than 37 years ago. Our client needs additional time to research what, if any, records and documents exist as to this matter these decades later. Lighthouse's situation, as a small electric cooperative, is further complicated by the fact that the cooperative is still utilizing every available employee, from its General Manager to its most recently hired employee, to continue recovery from a recent ice storm which felled more than 1000 utility poles of the cooperative. Lighthouse will continue to replace poles for probably 6 weeks from the date of this letter. The additional time would allow our client to recover staff from the recent weather event, who could then be utilized to make a diligent search for any available records and

9819954

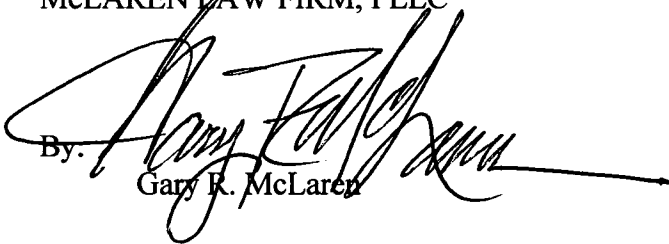


information concerning this matter, which would also assist in a more fruitful communication with other PRP's as encouraged within your Demand.

Thank you for your attention to this matter, and I look forward to our reply.

Yours very truly,

McLAREN LAW FIRM, PLLC

By:   
Gary R. McLaren

GRM/em

cc: Larry Ogden  
[larryo@lighthouse.coop](mailto:larryo@lighthouse.coop)